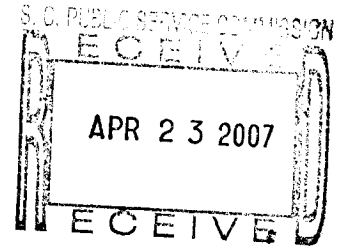


185671

BRICKFIELD BURCHETTE
RITTS & STONE, PC

WASHINGTON, D.C.
AUSTIN, TEXAS

April 19, 2007



Mr. Charles Terreni
Chief Clerk
Public Service Commission of South Carolina
P.O. Drawer 11649
Columbia, SC 29211

Re: Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc. –
Annual Review of Base Rates for Fuel Costs.
Docket No. 2007-1-E

Dear Mr. Terreni:

Enclosed for filing is Nucor Steel-South Carolina's Second Set of Continuing
Data Requests to PEC in the above referenced matter.

Sincerely,

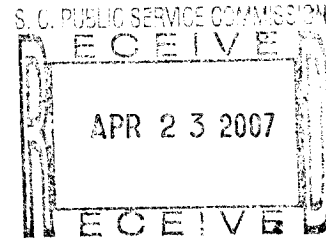
A handwritten signature in black ink, appearing to read "Michael K. Lavanga".

Michael K. Lavanga

Enclosure

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2007-1-E



In the Matter of:

**Carolina Power & Light Company d/b/a
Progress Energy Carolinas, Inc.
Annual Review of Base Rates
For Fuel Costs**

**NUCOR-STEEL
SOUTH CAROLINA'S
SECOND SET OF
CONTINUING DATA REQUESTS
TO PEC**

Nucor Steel-South Carolina ("Nucor") hereby propounds the following data requests (interrogatories and requests for production of documents) to Progress Energy Carolinas, Inc. ("PEC") and requests that the information and documents requested below be provided within 20 days of receipt of this request by PEC. These requests are continuing in nature and PEC is requested to provide any and all information available as of the date of the response and then complete or update the response as necessary as additional information becomes available.

INSTRUCTIONS

1. In answering each Request, please state the text of the Request prior to providing the response. Each Request and applicable response should be on a separate page. Where there are subparts to a Request, each subpart and applicable response should be on a separate page. Each Request is continuing in nature. Thus, if PEC acquires or discovers additional or different information with respect to a Request after the Request has been initially answered, PEC is required to supplement its response immediately following the receipt of such additional or different information, giving the additional or different information to the same extent as originally requested. PEC may not postpone serving such responsive supplemental information until after the filing of any testimony or supporting documents in this proceeding. Initial and supplementary responses shall be full, complete and accurate since they will be relied upon by Nucor for the purposes of this proceeding. For each Request, list all assumptions made by PEC in answering said Request.
2. In the event that PEC asserts that any of the information requested is deemed by it to be privileged or proprietary, then PEC in its written response should identify any such data, and any supporting documents, by date and general content. PEC should also identify all persons who participated in the preparation of the document and all persons, inside or outside PEC, who received a copy, read, or examined any such document. In addition, PEC should indicate its claim of privilege with particularity and describe the grounds upon which privilege is claimed. State the present location of the document and all copies thereof and identify each person having custody or control of the document and said copies.

**SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS**

3. To the extent that PEC asserts that any requested information is not relevant or not material to any issue in the above-captioned matter, PEC, in its written response hereto, should indicate a specific basis for said assertion in the context of any issues arising in this proceeding.
4. In the event PEC asserts that any requested information is not available in the form requested, PEC, in its written response thereto, should disclose the following:
 - (a) the form in which the requested data currently exists (identifying documents by title);
 - (b) whether it is possible under any circumstances for PEC to provide the data in the form requested;
 - (c) the procedures or calculation necessary to provide the data in the form requested;
 - (d) the length of time (in hours or days) necessary for PEC to prepare the data in the form requested; and
 - (e) the earliest dates, time period, and location that representatives of Nucor may inspect PEC's files, records or documents in which the requested information currently exists.
5. The Requests contained herein contemplate that individual copies of any documentary material requested will be provided to Nucor as is the usual custom in regulatory proceedings. In the event that PEC asserts that any requested documents are too voluminous, or, for some other reason, copies cannot be provided to Nucor, PEC is requested to make such voluminous or otherwise undeliverable documentary material available for inspection as of the date of the required written responses at such time and place as may be mutually agreed upon among counsel for the parties. PEC is requested to provide notice to Nucor at least two Business Days in advance of the date of the required written responses that it contemplates asserting that any requested documents will be too voluminous to provide Nucor with individual copies, or will otherwise be undeliverable according to PEC. PEC is also requested to provide notice no less than 2 Business Days in advance of the date of required written responses estimating the size and character of any voluminous materials and/or documents, and to provide copying of any noticed materials pursuant to Nucor's designation at Nucor's expense at that time.
6. In providing documents, PEC is requested to furnish all documents or items in its physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of PEC or any of PEC's employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise. If documents responsive to a request existed at one time but have been discarded, lost or destroyed, please describe by category such documents, state the identity of the person having knowledge of the circumstances of their discard, loss or destruction, and state the date on which such documents were discarded, lost or destroyed.
7. To the extent any requested document cannot be provided in full, it shall be provided to the extent possible, with an indication of what document or portion of what document is being withheld and the reasons for withholding said document.
8. Documents are to be produced as they are kept in the usual course of business. To the extent that they are attached to each other, documents should not be separated.

**SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS**

9. Documents not otherwise responsive to this Request shall be provided if such documents are attached to documents responsive to this Request, and constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar materials.
10. For each Request answered, provide the name of the person or persons answering, the title of such persons and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document provided. PEC shall provide all responses under oath.
11. Unless otherwise indicated, the following Requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2005, through and including the date of your response.
12. Where these Requests seek quantitative or computational information (*e.g.*, models, analyses, databases, formulas) stored by PEC or its consultants in machine-readable form, in addition to providing a hard copy, PEC is requested to furnish such machine-readable information on CD-ROM in MS Excel file format.
13. To the extent possible, where these Requests seek non-quantitative narrative information (*e.g.*, studies, reports, memorandum, correspondence) stored by PEC or its consultants in machine readable form, in addition to providing a hard copy, PEC is requested to furnish such machine-readable information on CD-ROM in MS Word format.
14. Responses to any of these Requests may include incorporation by reference to responses to other Requests only under the following circumstances:
 - (a) the reference is explicit and complies with instruction 11; and
 - (b) unless the entirety of the referenced response is to be incorporated, the specific information or documents of the referenced response shall be expressly identified.
15. Nucor requests that PEC send by overnight delivery service (such as Federal Express or a comparable service) one copy of its responses to this Request to each of the following:

Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone, P.C,
1025 Thomas Jefferson Street, NW
Eighth Floor-West Tower
Washington, DC 20007

Thomas S. Mullikin
Robert R. Smith II
Moore & Van Allen, PLLC
100 North Tryon Street
Suite 4700
Charlotte, NC 28202

Responsive information and documents should be provided as they become available and should not be withheld until a complete response to all of Nucor's requests is available.

**SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS**

DEFINITIONS

1. "PEC" refers to Carolina Power & Light d/b/a Progress Energy Carolinas, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
2. "PSC" means the South Carolina Public Service Commission.
3. "Nucor" means Nucor Steel-South Carolina.
4. "Historical period" refers to the time period between April 1, 2006 and March 31, 2007.
5. "Forecast period" or "projected period" refers to the time period between April 1, 2007 and June 30, 2008.
6. "Identify" means as follows:
 - (a) when used in reference to an individual, to state his full name and present or last known residence address and telephone number, his present or last known position and business affiliation, and his position and business affiliation at the time in question;
 - (b) when used in reference to a commercial or governmental entity, to state its full name, type of entity (*e.g.*, corporation, partnership, single proprietorship), and its present or last known address;
 - (c) when used in reference to a document, to state the date, author, title, type of document (*e.g.*, letter, memorandum, photograph, tape recording, etc.) and its present or last known location and custodian;
 - (d) when used in reference to a communication, to state the type of communication (*i.e.*, letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto; and
 - (e) when used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
7. The term "document" as used in the Requests contained herein is used in its customary broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term specifically includes reports, studies, statistics, projections, forecasts, decisions and orders, e-mail communications, intra-office and inter-office communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, graphs, sketches, computer printouts, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, brochures, bulletins, pamphlets, books, articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic, mechanical and electrical records of any kind (including, without limitation, tapes, tape cassettes, disks and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program

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documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes and amendments to the foregoing, and all other documents or tangible things of whatever description that constitute or contain information within the scope of a Request that are in the possession of PEC. A Request seeking the identification or production of documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or provided; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production.

8. "Communication" shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, e-mail and personal conversations. A Request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
9. The "substance" of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
10. Words expressing the singular number shall be deemed to express the plural number; those expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
11. The unqualified terms "or" and "and" shall be construed either conjunctively or disjunctively to bring within the scope of these Requests any matters that might otherwise be construed to be outside their scope.
12. The unqualified term "person" shall mean an individual, corporation, partnership, unincorporated association or other business or governmental entity.
13. The term "e.g." or "for example" indicates illustration by example, not limitation.

**SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS**

QUESTIONS

- NUC-2-1 Please provide a chart showing the corporate relationships between PEC and any affiliate of PEC's which had direct or indirect involvement with the procurement or administration of fossil fuel supply for any of PEC's generating plants during the historical period or which will be involved during the forecast period. Describe the duties of any such affiliates and explain whether these affiliates were involved in the procurement or administration of fossil fuel supply to any other Progress Energy, Inc. operating company.
- NUC-2-2 Please provide an organization chart for the fuel procurement functions of PEC and/or any relevant affiliate, indicating by job title and responsibility the employees who were responsible for procurement or administration of PEC's fossil fuel supply for any part of the historical period.
- NUC-2-3 Please provide an unredacted copy of the study of PEC's fuel procurement prepared by ORS in 2006.
- NUC-2-4 Please provide the following information for all existing and/or proposed coal contracts that have supplied or will supply coal to PEC during the historical and forecast periods:
- (a) Identification of the contract;
 - (b) Railroad(s) which can originate coal supplied under the contract;
 - (c) Description of any constraints at the mine(s) which limit the number or type of railcars in any unit train which is loaded at the mine;
 - (d) Description of coal transportation arrangements, if coal is not loaded into railcars at the mine for transport to PEC's generating plants;
 - (e) Explanation of methods to adjust coal price for variations in coal quality.
- NUC-2-5 Please explain whether Progress Energy Inc.'s Coal and Synthetic Fuels business segment sold any synthetic fuel to PEC during the historical period, and, if so, provide the following information:
- (a) Identification of the contract under which this synfuel was sold;
 - (b) Date, quantity, quality, and per unit price of any fuel which was sold to PEC;
 - (c) Per unit cost for delivery to the relevant PEC generating unit for any such sales.

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NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS

- NUC-2-6 Please explain whether any PEC affiliate sold any coal to PEC from its mining operations in Kentucky and Virginia. If so, provide the following information:
- (a) Identification of the contract under which this coal and/or coal-related service was provided;
 - (b) Date and per unit price of coal;
 - (c) Quantity and quality of coal sales.
- NUC-2-7 Please provide the following information:
- (a) Description of the frequency of refueling outages for each PEC nuclear unit;
 - (b) Date and duration of the last refueling outage for each PEC nuclear unit;
 - (c) Projected date and duration of any refueling outage for any PEC nuclear unit (specify) during the forecast period;
 - (d) Explanation for any projected refueling outage that occurs outside of the schedule provided in response to item (a) of this question;
 - (e) Explanation for any projected refueling outage that is longer in duration than that provided in response to item (a) of this question.
- NUC-2-8 To the extent that it is not provided in response to other data requests, please provide a copy of each PEC contract for coal transportation which was effective during the historical period and/or which will be effective during the forecast period, and include all amendments which were or will be effective during those periods.
- NUC-2-9 For each coal transportation contract and/or transportation contract amendment negotiation with any railroad or other transportation provider conducted by PEC since April 1, 2006:
- (a) Identify and provide a list of each negotiation, the start and end date, and describe in detail the outcome;
 - (b) Explain in detail PEC's objectives;
 - (c) Explain in detail why PEC believes the outcome was reasonable and necessary and the result of a prudent action;
 - (d) Identify and provide a copy of the contract or amendment, if any resulted from the negotiation;
 - (e) Identify and provide a copy of communications (or evidence of communications) with the coal transporter; and
 - (f) Identify and provide a copy of all internal communications, analyses or memoranda related to the contract and/or amendment.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS

- NUC-2-10 Please provide the following information about unit trains and/or railcars leased by PEC (or its affiliates) for coal transportation to PEC's coal-fired generating plants for the historical period:
- (a) Number of railcar sets in service to PEC;
 - (b) PEC identification of trainsets;
 - (c) Number of cars in each set;
 - (d) Description of car type (steel or aluminum and type of unloading);
 - (e) Car capacity in tons;
 - (f) Term of lease;
 - (g) Owner and lessee.
- NUC-2-11 Please provide a copy of each PEC contract for coal supply which was effective during the historical period and/or which will be effective during the forecast period, and include all amendments which were or will be effective during those periods. Also please provide a copy of each spot coal purchase order (or other purchase agreement) under which PEC received coal for the historical period or will receive coal during the forecast period.
- NUC-2-12 Please provide a copy of PEC's nominations to its coal and rail suppliers for the calendar years 2006 and 2007.
- NUC-2-13 Please provide the following information regarding any litigation between PEC and its coal suppliers and/or coal transporters which was ongoing or resolved during the historical period:
- (a) Identification of supplier or transporter and contract under litigation;
 - (b) Identification of filing;
 - (c) Description of claims and counterclaims;
 - (d) Status of litigation;
 - (e) Copy of any final orders.
- NUC-2-14 To the extent not addressed in PEC's response to any other data request, please describe any disputes between PEC and any of its coal suppliers which affected PEC's contract coal costs and/or were related to coal quality during the historical period. Provide identification of supplier and contract, nature and details of dispute, quantity and existing contract price of coal involved, internal documentation related to the dispute, and related correspondence between the coal supplier and PEC.
- NUC-2-15 To the extent not addressed in PEC's response to any other data request, please describe any disputes between PEC and any railroad which affected PEC's deliveries or transportation contract costs since the beginning of the historical period. Please identify the railroad and contract involved, relevant dates, nature

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS

and details of the dispute, quantity and existing contract price of coal, transportation, internal correspondence related to the dispute, and related correspondence between the coal supplier and/or railroad and PEC.

- NUC-2-16 Please provide details of each instance in the historical period when a coal supplier failed to provide the amounts of coal nominated by PEC or otherwise called for by contract or purchase order. Include name of supplier and identification of contract or purchase order, reasons for supply failure, tonnage and cost of coal deficiency, details of any claim of force majeure, analysis of the cost consequences to PEC, source and cost of replacement coal, internal documentation related to the deficiency, and related correspondence between PEC and the coal supplier.
- NUC-2-17 Please describe any PEC filings at the Surface Transportation Board which were pending or resolved during the historical period, or that will continue during the forecast period, or that PEC plans to initiate during the forecast period. Include a copy of PEC's filing(s) and a copy of any final decision.
- NUC-2-18 Please provide details of each instance under which a railroad failed to deliver coal nominated by PEC during the historical period, including:
- (a) Identification of railroad and contract;
 - (b) Date and duration of delivery shortfall;
 - (c) Reason for shortfall;
 - (d) Dates of any claims by railroad of force majeure;
 - (e) Tonnage shortfall under any claim of force majeure;
 - (f) Tonnage shortfall not covered by claim of force majeure;
 - (g) PEC coal supply contracts affected by the shortfall;
 - (h) Inventory and cost effects on PEC of the shortfall;
 - (i) Explanation of contract makeup provisions;
 - (j) Explanation of whether any delivery deficiencies were made up or will be made up;
 - (k) Internal documentation related to the delivery shortfall, including related analyses or recommendations; and
 - (l) Correspondence between PEC and the railroad.
- NUC-2-19 Please provide details of any claims of force majeure made by PEC to any of its coal suppliers or to its rail transporters.
- NUC-2-20 Please explain how PEC monitors the capabilities of its current coal suppliers to meet future tonnage and quality requirements. Provide reports of any such evaluations of PEC's coal suppliers which have been made since the beginning of 2005.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS

NUC-2-21 Please provide the following information, to the extent that it has not been provided in response other data requests, for any solicitations for coal supply made by PEC since April 1, 2006:

- (a) Date of solicitation;
- (b) Purpose of solicitation, including coal tonnage requirement and coal quality and relevant dates;
- (c) Documentation supporting the need for PEC to purchase the amount of coal over the relevant time period;
- (d) Description of the process by which PEC developed qualified a supplier list for this solicitation;
- (e) Copy of qualified supplier list;
- (f) Copy of bid solicitation;
- (g) Copy of bid evaluation, including economic evaluation and any other criteria used by PEC to select coal supplier;
- (h) Description of result of the bid solicitation.

NUC-2-22 Please provide the following information regarding PEC's coal inventory during the historical and/or forecast periods;

- (a) Copy of studies which recommended the coal inventory levels (days burn, and MMBtus and/or tons) at each coal-fired generating plant for the historical period or which recommend such levels for the forecast period.
- (b) Beginning and ending amounts of coal in inventory for each month of the historical period, in days burn, tons, MMBtus, and dollars;
- (c) Explanation for any difference between target and actual inventory level if these differences were large enough to affect PEC's dispatch of the plant or fuel procurement plans;
- (d) Description of method for converting one day's coal burn to tons and MMBtus of coal;
- (e) Explanation of whether, for accounting purposes, PEC maintains more than one stockpile at any coal-fired generating plant and, if so, reasons and descriptions of each stockpile at each plant;
- (f) Method of inventory accounting (e.g. average or LIFO) for each stockpile;
- (g) Explanation of each cost item which is included in inventory cost (e.g., coal FOB mine cost, railcar lease costs, and railcar maintenance costs);
- (h) Explanation of whether inventory carrying costs are included in base rates or as fuel costs;
- (i) Description of PEC policies and procedures for scheduling coal stockpile surveys and accounting for any resulting discrepancies;
- (j) Dates and locations of coal stockpile surveys in historical period;

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS

- (k) Results of historical period coal stockpile surveys in tons over or under, MMBtus over or under, and dollars.
- NUC-2-23 For each coal-fired generating plant, please provide the following information for each contract and/or spot supply of coal to that plant for each month of the historical period:
 - (a) Name of each coal supplier to that plant (and contract name or number if multiple contracts or purchases orders from that supplier);
 - (b) Tons received at plant;
 - (c) Average heating value;
 - (d) Average coal cost per ton FOB mine;
 - (e) Cost of associated SO₂ emission allowances and, if applicable, NO_x allowances or any other emission allowances.
 - (f) Average rail transportation cost per ton, breaking out any fuel surcharges in particular;
 - (g) Average railcar lease and maintenance cost per ton;
 - (h) Average cost per ton for other modes of transportation;
 - (i) Cost per ton for any other item which is tracked on a delivered-to-plant basis and included in delivered fuel costs.
- NUC-2-24 Please list each type of cost which is included in PEC's FERC Form 423 submittals for its delivered costs of fuel to PEC's coal-fired generating plants.
- NUC-2-25 Please provide the following information regarding PEC's fuel cost hedging activities:
 - (a) Copy of PEC policies and/or procedures for hedging;
 - (b) Description of PEC's or Progress Energy Inc.'s limitations on the amount of dollars which PEC may have at risk from any one hedging transaction;
 - (c) Description and explanation of any instance in the historical period when dollar at risk limitations were exceeded for a particular hedging transaction.
- NUC-2-26 Referring to coal transportation cost forecasts used in PEC's fuel cost forecast:
 - (a) Please describe the process used by PEC to develop rail cost forecasts for coal transportation to its coal-fired generating plants for the forecast period;
 - (b) Please provide a listing of PEC's estimates of rail transportation cost on a per ton basis for each month of the forecast period, including costs under each rail contract for shipment of coal from each mine supplying PEC's plants and to each coal-fired

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS

- generating plant which will receive coal from that mine. Include separately PEC's estimates for fuel surcharges, if applicable.
- (c) Provide a listing of PEC's estimates of costs for all other types of coal transportation (e.g., truck) from each relevant location to each plant, as applicable, for each month of the forecast period.
 - (d) Please provide all forecasts for relevant indices and/or other coal transportation costs which were developed by parties other than PEC and which were relied upon by PEC.
- NUC-2-27 Please provide the following information regarding test burns of various types (non-CAPP) coal in PEC's coal-fired generating plants. Provide this information for all test burns conducted since January 1, 2004, and for all earlier test burns which gave results valid for the historical period and/or the forecast period:
- (a) Designation of plant and unit at which PEC conducted the test burn;
 - (b) Date and duration of test burn;
 - (c) All types of coal and percentages of each which were burned at any one time during the test (e.g., 50% CAPP coal and 50% PRB coal);
 - (d) Specific piece of equipment which limited the percentage of non-CAPP coal which could be burned during the test (if such limits were found);
 - (e) Description of the problems resulting with that equipment;
 - (f) Results and conclusions of the test;
 - (g) Summary of follow-up work or follow-up testing which resulted from the test;
 - (h) If no test burns have been made at any of PEC's units, explanation of why not.
- NUC-2-28 Please provide the proximate and ultimate specifications for all coals for which the boilers were designed at the following units: Mayo, and the coal-fired units at Roxboro which were put into service since 1975. To the extent these specifications are not available, please provide a description of all boiler design coals for the Mayo and Roxboro units.
- NUC-2-29 Please provide a list of and a reference to all North Carolina and South Carolina regulations which restrict the types of fuel which PEC can burn in any of its generating units in that state.
- NUC-2-30 For each natural gas contract which was effective in the historical period or which will be effective in the forecast period, please provide the following information regarding contract price:

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2007-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS

- (a) Basis of price per MMBtu or per Mcf, e.g., fixed price or index-based price;
- (b) For contracts with an index-based price, identify each contract and specify which index is applicable;
- (c) Provide the value of each relevant index on a monthly basis for the historical period.

NUC-2-31 Please provide the following generating unit performance information for each PEC coal-fired generating unit (as opposed to plant) for each month of the historical period:

- (a) Net unit heat rate;
- (b) Equivalent availability;
- (c) Forced outage hours;
- (d) Scheduled outage hours;
- (e) Maintenance outage hours;
- (f) Reserve shutdown hours; and
- (g) Capacity factor.

* * * * *



Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts, & Stone, P.C.
1025 Thomas Jefferson Street, NW
8th Floor West
Washington, DC 20007
(202) 342-0800

Thomas S. Mullikin
Robert R. Smith, II
Moore & Van Allen, PLLC
100 North Tryon Street
Suite 4700
Charlotte, NC 28202
(704) 331-3580

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2007-1-E

In the Matter of:

**Carolina Power & Light Company d/b/a
Progress Energy Carolinas, Inc.
Annual Review of Base Rates
For Fuel Costs**

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Certificate of Service

This is to certify that a copy of the foregoing document, **NUCOR STEEL-SOUTH CAROLINA'S SECOND SET OF CONTINUING DATA REQUESTS TO PEC**, was served upon the following parties at the addresses set forth by first-class mail, electronic mail, telefax, or Federal Express on this the 19th day of April, 2007:

Len S. Anthony, Esq.
*Carolina Power and Light Company d/b/a
Progress Energy Services Company*
Legal Department - PEB 17A4
Post Office Box 1551
Raleigh, NC 27602

Florence P. Belser, Esq.
Nannette S. Edwards, Esq.
Wendy B. Cartledge, Esq.
Office of Regulatory Staff
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